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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JIMMY COLSON, an individual;

Plaintiff,

v.

BULOW HOLDINGS, LLC, a Delaware  
limited liability company; and, OSSUR  
AMERICAS, INC., a California corporation;

Defendants.

CASE NO.: 2:22-cv-1950-APG-BNW

**STIPULATION AND [PROPOSED] ORDER TO STAY ALL PROCEEDINGS**

**(FIRST REQUEST)<sup>1</sup>**

WHEREAS, on October 20, 2022, Plaintiff Jimmy Colson (“Plaintiff”) commenced this action in the Eighth Judicial District Court for Clark County, Nevada against Defendants, Bulow Holdings, LLC and Ossur Americas, Inc. (“Defendants”);

WHEREAS, on November 18, 2022, Defendants removed the action to this Court;

WHEREAS, the parties have agreed to mediate their dispute and are currently arranging a mediation;

<sup>1</sup> The parties previously submitted a Stipulation and [Proposed] Order Extending the Time for Defendants to File and Serve Their Answer or Other Response to the Complaint [ECF No. 5], but this prior stipulation only pertained to the deadline for Defendants to respond to Plaintiff’s Complaint. The Court adopted this stipulation and issued the Stipulation and Order Extending the Time for Defendants to File and Serve Their Answer or Other Response to the Complaint [ECF No. 6] on November 29, 2022.

1 WHEREAS, incurring additional litigation costs will reduce the parties' available  
2 resources and, by extension, reduce the likelihood of the parties resolving their dispute through  
3 mediation;

4 WHEREAS, in the interests of focusing the parties' resources on the planned mediation  
5 and preserving judicial resources, the parties wish to stay all further proceedings in this matter,  
6 including but not limited to responses to the complaint, discovery, motions practice, and case  
7 management conferences; and

8 WHEREAS, the case is at its very inception and the short stay of further proceedings at  
9 this early stage will not result in any undue delay and will instead preserve resources, overall  
10 judicial economy, and improve the chances of an early resolution.

11 IT IS HEREBY STIPULATED AND AGREED, by the parties, through  
12 undersigned counsel, pursuant to LR IA 6-1, 6-2, and LR 7-1, and subject to the approval of the  
13 Court, that:

14 1. All proceedings in this action shall be stayed, including responses to the  
15 complaint, discovery, motions practice, and case management conferences, pending further order  
16 of the Court.

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2. The parties shall use best efforts to secure a setting for the mediation of claims, and shall pursue the resolution of all disputes in good faith.

3. The parties shall file a joint status report within 60 days of the entry of this order.

Dated: this 8th day of December 2022

**IT IS SO AGREED AND STIPULATED:**

SPENCER FANE LLP


HOLLY DRIGGS

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*Attorneys for Defendants Bulow Holdings,  
LLC and Ossur Americas, Inc.*

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: December 9, 2022